

### **REMARKS**

This is a full and timely response to the non-final Office Action of February 9, 2005. Reexamination, reconsideration, and allowance of the application and all presently pending claims are respectfully requested.

Upon entry of this First Response, claims 1-38 are pending in this application and claims 1-7, 16, and 20-25 have been allowed. Claims 12, 18, and 29 are directly amended herein, and claims 32-38 are newly added. Furthermore, the drawings and specification have been amended to correct for minor errors and/or inconsistencies in the instant application. In particular, with respect to the drawings, Figs. 7 and 8 have been amended to replace the reference numeral "81" with the reference numeral "101," and Fig. 15 has been amended to replace the reference numeral "531" with the reference numeral "551." It is believed that all of the foregoing amendments add no new matter to the present application.

### **Response to Specification and Drawing Objections**

The specification and drawings are objected to for allegedly having various informalities. Applicants assert that the specification and drawings have been amended herein to correct for several of the alleged informalities and to comply with several of the requirements set forth in the Office Action regarding the alleged informalities.

However, it is asserted in the Office Action reference numerals "156" and "158" have both been used to designate "generalized output devices." The Office Action then suggested that "output device 158" should be eliminated from the drawings. Applicants have amended the

specification herein to reference the components 156 and 158 more clearly, and, thus, elimination of the “output device 158” is unnecessary.

Moreover, Applicants respectfully request that the objections to the specification and drawings be withdrawn.

#### **Response to §112 Rejections**

Claim 29 presently stands rejected under 35 U.S.C. §112, second paragraph. In particular, it is alleged in the Office Action that the limitation “wherein the prioritizing is based on the determining” in claim 29 lacks a sufficient antecedent basis. Applicants submit that claim 29 has been amended herein making the foregoing rejection moot. Accordingly, Applicants respectfully request that the 35 U.S.C. §112, second paragraph, rejection of claim 29 be withdrawn.

#### **Response to §102 Rejections**

A proper rejection of a claim under 35 U.S.C. §102 requires that a single prior art reference disclose each element of the claim. See, *e.g.*, *W.L. Gore & Assoc., Inc. v. Garlock, Inc.*, 721 F.2d 1540, 220 U.S.P.Q. 303, 313 (Fed. Cir. 1983).

### Claim 8

Claim 8 presently stands rejected under 35 U.S.C. §102 as allegedly anticipated by *Malzbender* (U.S. 2002/0060679 A1). Claim 8, as amended, reads as follows:

8. A texture mapping system, comprising:  
memory for storing a first texture map and a parametric texture map; and  
***a texture map manager configured to receive a command to combine at least a portion of the first texture map and at least a portion of the parametric texture map, the texture map manager configured to convert, in response to the command, the first texture map portion into a form corresponding to a form of the parametric texture map portion*** and to combine the first texture map portion and the parametric texture map portion. (Emphasis added).

Applicants respectfully assert that *Malzbender* fails to disclose at least the features of claim 8 highlighted hereinabove. Accordingly, the 35 U.S.C. §102 rejection of claim 8, as amended, is improper.

In this regard, it is alleged in the Office Action that *Malzbender* discloses combining a “first texture map” and a “parametric texture map” in response to a “command” at paragraphs 0028 and 0029. It is further alleged that *Malzbender* discloses a conversion of texture maps from one form into another at paragraphs 0050-0052. However, there is nothing in *Malzbender* to indicate that any of the alleged conversion of texture maps at paragraphs 0050-0052 is “in response” to the “command” allegedly disclosed at paragraphs 0028 and 0029. Accordingly, *Malzbender* fails to disclose “a texture map manager configured to receive a command to combine at least a portion of the first texture map and at least a portion of the parametric texture map... (and) to convert, ***in response to the command***, the first texture map portion into a form corresponding to a form of the parametric texture map portion,” as described by claim 8. (Emphasis added).

For at least the foregoing reasons, Applicants submit that *Malzbender* fails to disclose each feature of pending claim 8. Accordingly, the 35 U.S.C. §102 rejection of claim 8 should be withdrawn.

#### **Claims 9-11, 14, 15, and 32-34**

Claims 9-11, 14, and 15 presently stand rejected in the Office Action under 35 U.S.C. §102 as allegedly anticipated by *Malzbender*. Further, claims 32-34 have been newly added via the amendments set forth herein. Applicants submit that the pending dependent claims 9-11, 14, 15, and 32-34 contain all features of their respective independent claim 8. Since claim 8 should be allowed, as argued hereinabove, pending dependent claims 9-11, 14, 15, and 32-34 should be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

#### **Claim 17**

Claim 17 presently stands rejected under 35 U.S.C. §102 as allegedly anticipated by *Malzbender*. Claim 17, as amended, reads as follows:

17. A texture mapping system, comprising:  
means for storing a first texture map and a parametric texture map; and  
***means for combining, in response to a command, the first texture map and a parametric texture map thereby forming a combined texture map, the combining means configured to convert, in response to the command, the first texture map portion into a form compatible with a form of the parametric texture map portion.*** (Emphasis added).

For at least reasons similar to those set forth hereinabove in the arguments for allowance of claim 8, Applicants respectfully assert that *Malzbender* fails to disclose at least the features of claim 17 highlighted hereinabove. Accordingly, the 35 U.S.C. §102 rejection of claim 17, as amended, is improper and should be withdrawn.

### **Claim 26**

Claim 26 presently stands rejected under 35 U.S.C. §102 as allegedly anticipated by *Malzbender*. Claim 26, as amended, reads as follows:

26. A texture mapping method, comprising:  
*receiving a command to combine at least a portion of a first texture map and at least a portion of a parametric texture map;*  
*converting, in response to the command, the first texture map into a form compatible with a form of the parametric texture map portion;* and  
combining the first texture map portion and the parametric texture map portion in response to the command. (Emphasis added).

For at least reasons similar to those set forth hereinabove in the arguments for allowance of claim 8, Applicants respectfully assert that *Malzbender* fails to disclose at least the features of claim 26 highlighted hereinabove. Accordingly, the 35 U.S.C. §102 rejection of claim 26, as amended, is improper and should be withdrawn.

### **Claims 27, 28, 30, 31, and 36-38**

Claims 27, 28, 30, and 31 presently stand rejected in the Office Action under 35 U.S.C. §102 as allegedly anticipated by *Malzbender*. Further, claims 36-38 have been newly added via the amendments set forth herein. Applicants submit that the pending dependent claims 27, 28, 30, 31, and 36-38 contain all features of their respective independent claim 26. Since claim 26 should be allowed, as argued hereinabove, pending dependent claims 27, 28, 30, 31, and 36-38 should be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

### **Claim 35**

Claim 35 has been newly added via the amendments set forth herein. Applicants submit that the pending dependent claim 35 contains all features of its independent claim 17. Since claim 17 should be allowed, as argued hereinabove, pending dependent claim 35 should be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

### **Allowable Subject Matter**

Claims 12, 13, 18, 19, and 29 have been indicated as allowable by the outstanding Office Action if such claims are rewritten to include the limitations of their respective base claims. Pending claims 12, 18, and 29 have been amended herein to include features of their respective base claims. It is believed that claims 12, 18, and 29 are allowable in their present form, and Applicants respectfully request that the objections to these claims be withdrawn. Further, claims 13 and 19 include the features of allowable claims 12 and 18, respectively. Thus, claims 13 and 19 are allowable as a matter of law. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).


**CONCLUSION**

Applicants respectfully request that all outstanding objections and rejections be withdrawn and that this application and all presently pending claims be allowed to issue. If the Examiner has any questions or comments regarding Applicants' response, the Examiner is encouraged to telephone Applicants' undersigned counsel.

Respectfully submitted,

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